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November 22, 2024

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow Mr. Goetsche to travel to the Southern District of New York in December 2024 for in-person meetings with the undersigned counsel. Mr. Goetsche shall provide a detailed itinerary of travel and hotel accommodations to Pretrial Services at least two weeks in advance of travel. The Court's Order Setting Conditions of Release (dkt. 171), in pertinent part, restricts his travel to the District of Colorado and the District of New Jersey. The Court previously allowed meetings with counsel in New York (dkts. 224, 274, 283). This proposed modification for travel to New York would be in addition to, and not in place of, all other bail conditions ordered or modified by the Court.

Pretrial Services and the government, through AUSA Anthony Torntore, each consent to the proposed modification for travel to the Southern District of New York. Thank you in advance.

Respectfully submitted,

/s/ Rodney Villazor

Rodney Villazor, Esq.
CLARK SMITH VILLAZOR LLP

The Hon. Michael A. Hammer

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cc: Matthew Menchel, Esq.
Sean Buckley, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)